

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

MARDY B. WILLIAMS, SR.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:05CV-1220-WKW
	)	
NORMENT SECURITY GROUP, INC., ET	)	Judge W. Keith Watkins
AL.,	)	
	)	
Defendants.	)	
	)	

**AMENDED REPORT OF PARTIES' PLANNING MEETING**

Plaintiff, by his attorneys, Brantley W. Lyons, P.C. and Law Offices of Jay Lewis, LLC, and Defendant Norment Security Group, Inc.,<sup>1</sup> by its attorneys, Capell & Howard P.C. and Seyfarth Shaw LLP, respectfully submit this Report of Parties' Planning Meeting in accordance with Fed. R. Civ. P. 26(f).

1. Pursuant to Fed. R. Civ. P. 26(f), a telephonic meeting was held on August 11, 2006 and was attended by Brantley W. Lyons for Plaintiff and Molly Eastman for Defendant.

2. Pre-Discovery Disclosures. The parties will exchange by October 20, 2006 the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the Court the following discovery plan:

Discovery will be needed on the following subjects: Liability for Plaintiff's race discrimination claims, the extent of any damages, and Plaintiff's mitigation (if any) of his alleged damages. The parties do not waive any arguments regarding the scope or propriety of any requested discovery.

All discovery commenced in time to be completed by September 3, 2007.

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<sup>1</sup> Plaintiff's claims against Defendant Ted Arkuszeski, John Woods, and Burtice Bright were dismissed by this Court's order dated June 29, 2006.

Maximum of 25 interrogatories by each party to any other party.

Maximum of 25 requests for admission by each party to any other party.

Maximum of 10 depositions by Plaintiff and 10 by Defendant.

Each deposition limited to maximum of 8 hours unless extended by agreement of parties.

Reports from retained experts under Rule 26(a)(2) due:

From Plaintiff by July 3, 2007; and

From Defendant by July 16, 2007.

Supplementations under Rule 26(e) due July 3, 2007.

4. Other Items:

The parties do request a conference with the court before entry of the scheduling order.

The parties request a pretrial conference on November 5, 2007.

Plaintiff should be allowed until May 7, 2007 to join additional parties and until May 7, 2007 to amend the pleadings.

Defendant should be allowed until June 5, 2007 to join additional parties and until June 5, 2007 to amend the pleadings.

All potentially dispositive motions should be filed by August 3, 2007.

Settlement cannot be evaluated at this date.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due

From Plaintiff by November 19, 2007.

From Defendant by November 21, 2007.

Parties should have 5 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial by December 10, 2007.

Respectfully submitted,

By: s/ Brantley W. Lyons  
One of Plaintiff's Attorneys

By: s/ Molly Eastman  
One of Defendant's Attorneys

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Dated: September 15, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2006, I electronically filed **Report of Parties' Planning Meeting** with the Clerk of Court using the CM/ECF system, which will send notification of this filing to:

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s/ Bruce J. Downey  
Bruce J. Downey